

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

JESSE DREWNIAK,)	
)	
Plaintiff,)	
)	
v.)	No. 1:20-cv-852-LM
)	
)	
U.S. CUSTOMS AND BORDER PROTECTION,)	
et al.,)	
)	
Defendants.)	
_____)	

**PLAINTIFF'S ASSENTED-TO MOTION TO EXTEND DEADLINE FOR
SUPPLEMENTAL ESI STATEMENT TO JULY 26, 2021**

Pursuant to Rule 7.2 of the Local Rules for the United States District Court for the District of New Hampshire, Plaintiff requests that the deadline for the parties' supplemental ESI statement be extended from June 25, 2021 to July 26, 2021.

The requested extension will not result in the continuation of any hearing, trial or conference in this matter. Counsel for the Defendants concurs in this Motion. Due to the nature of this Motion, no supporting memorandum of law is required

WHEREFORE, the Parties respectfully request that this Honorable Court:

- A. Extend the deadline for the Parties' Supplemental Statement Regarding ESI to July 26, 2021; and
- B. Grant any additional relief that is just and proper.

Respectfully submitted,

JESSE DREWNIAK,

By and through his attorneys affiliated with the American Civil Liberties Union of New Hampshire Foundation, the American Civil Liberties Union of Maine Foundation, and the ACLU Foundation of Vermont,

/s/ Gilles Bissonnette

Gilles R. Bissonnette (N.H. Bar. No. 265393)

SangYeob Kim (N.H. Bar No. 266657)

Henry R. Klementowicz (N.H. Bar No. 21177)

American Civil Liberties Union of New Hampshire

18 Low Avenue

Concord, NH 03301

Tel. 603.224.5591

gilles@aclu-nh.org

sangyeob@aclu-nh.org

henry@aclu-nh.org

/s/ Emma E. Bond*

Emma E. Bond

Zachary L. Heiden*

American Civil Liberties Union of Maine Foundation

P.O. Box 7860

Portland, Maine 04112

Tel. 207.619-8687

ebond@aclumaine.org

heiden@aclumaine.org

Lia Ernst*

James Diaz*

ACLU Foundation of Vermont

90 Main Street

Montpelier, VT 05602

Tel. 802.223.6304

lernst@acluvt.org

jdiaz@acluvt.org

Scott H. Harris (N.H. Bar No. 6840)
Steven Dutton (N.H. Bar No. 17101)
Jeremy Walker (N.H. Bar No. 12170)
McLane Middleton
900 Elm Street
Manchester, NH 03101
Tel. 603.628-1459
Scott.harris@mclane.com
Steven.Dutton@mclane.com
Jeremy.Walker@mclane.com

Albert E. Scherr (N.H. Bar No. 2268)
Professor of Law
University of New Hampshire School of Law
2 White Street
Concord, NH 03301
Tel. 603.513.5144
Albert.Scherr@law.unh.edu

Mark Sisti (N.H. Bar No. 2357)
Sisti Law Offices
387 Dover Road
Chichester, NH 03258
Tel. 603.224.4220
msisti@sistilawoffices.com